

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE ALLERGAN GENERIC DRUG  
PRICING SECURITIES LITIGATION

Civil Action No. 2:16-cv-09449 (KSH) (CLW)

**JOINT STIPULATION AND ORDER  
REGARDING CLASS CERTIFICATION  
BRIEFING SCHEDULE**

Plaintiffs Sjunde AP-Fonden and Union Asset Management Holding AG (“Plaintiffs”) and Defendants Allergan PLC, Brenton L. Saunders, Paul M. Bisaro, Maria Teresa Hilado, R. Todd Joyce, Sigurdur O. Olafsson, David A. Buchen, James H. Bloem, Christopher W. Bodine, Tamar D. Howson, John A. King, Ph.D., Catherine M. Klema, Jiri Michal, Jack Michelson, Patrick J. O’Sullivan, Ronald R. Taylor, Andrew L. Turner, Fred G. Weiss, Nesli Basgoz, M.D., and Christopher J. Coughlin (“Defendants”) respectfully submit this stipulation and proposed order jointly requesting an amendment to the class certification briefing deadlines set in the Court’s Order Regarding Amendment to Pretrial Scheduling Order in the above captioned action (Dkt. 142), as follows:

WHEREAS, the Court entered the initial Pretrial Scheduling Order in this Action on October 21, 2019 (Dkt. 134);

WHEREAS, the Court entered the Parties’ Joint Stipulation and Order Regarding Amendment to Pretrial Scheduling Order on March 11, 2020, which granted the Parties’ request for a one-week extension of Plaintiffs’ deadline to file their Motion for Class Certification and an eleven-week extension of all discovery deadlines (Dkt. 142);

WHEREAS, Plaintiffs filed a Motion for Class Certification on March 20, 2020 (Dkt. 143);

WHEREAS, the Court entered the Parties' Joint Stipulation and Order Regarding Class Certification Briefing on April 13, 2020, which requested an eight-week extension of the remaining briefing schedule on Plaintiffs' Motion for Class Certification and setting Defendants' opposition to be filed on July 31, 2020 and Plaintiffs' reply to be filed on September 18, 2020 (Dkt. 148);

WHEREAS, the Parties agreed to an approximately seven-week additional extension to the remaining briefing schedule to allow for the completion of class-certification discovery; and

WHEREAS, the Court conducted a telephonic status conference with the Parties on July 14, 2020, during which a proposed modification to the remaining briefing schedule on Plaintiffs' Motion For Class Certification was discussed;

**NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:**

1. The Parties respectfully request that the deadlines set forth in the Order Regarding Amendment to Pretrial Scheduling Order be modified as follows:

<u><b>Event</b></u>	<u><b>Current Date</b></u>	<u><b>Revised Date</b></u>
Opposition to Motion for Class Certification and accompanying rebuttal expert reports	July 31, 2020	September 21, 2020
Reply in Support of Motion for Class Certification and accompanying reply expert reports	September 18, 2020	November 9, 2020

Respectfully Submitted,

**CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.**

Dated: July 27, 2020

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**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_ July 28, 2020

*//s Cathy L. Waldor*

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HON. CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE